UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

IN RE: ETHICON PHYSIOMESH FLEXIBLE COMPOSITE HERNIA MESH PRODUCTS LIABILITY LIGITATION No. 1:17-md-02782-RWS

MDL No. 2782

THIS DOCUMENT RELATES TO ALL CASES

JOINT PROPOSED AGENDA FOR INITIAL CASE MANAGEMENT CONFERENCE

In accordance with the Court's June 21, 2017 Practice and Procedure Order and Notice of Initial Conference (Doc. 148), Defendants' counsel and the undersigned Plaintiffs' counsel respectfully suggest that the following items be included on the agenda for the August 1, 2017 initial case management conference:

- 1. Timing for selection of plaintiffs' leadership counsel;
- 2. Process and timing for entry of the case management orders listed below, including the process by which the parties will meet and confer on possible agreements and then submit any disputes to the court:
 - (a) Initial pleadings (including use of Master Long Form/Short Form Complaint and Master Answer);

- (b) Direct filings (including clarification of appropriate cases to be included in the MDL);
- (c) Service of process (including waiver/acknowledgment of service by Defendants);
- (d) Initial disclosures;
- (e) Exchange of fact sheets and/or profile forms;
- (f) Handling and exchange of electronically stored information;
- (g) Entry of protective order.
- 3. Discussion of process for meet and confers and resolution or refinement of issues and working documents.
- 4. Scheduling periodic meetings with the court, frequency and procedure.

Respectfully submitted this 30th day of June 2017,

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FONT CERTIFICATION

Pursuant to Local Rule 7.1 D, I hereby certify that the foregoing document was prepared using Times New Roman 14 point type as provided in Local Rule 5.1.

/s/ G. Brian Jackson
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CERTIFICATE OF SERVICE

I certify that on the 30th day of June, 2017, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the following attorneys of record:

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